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10 *General Bankruptcy Counsel for Lenard Schwartzer, Chapter 7 Trustee*

11 **UNITED STATES BANKRUPTCY COURT**

12 **DISTRICT OF NEVADA**

13 In re:

14 **SIX STAR CLEANING AND CARPET**
 15 **SERVICES, Inc.,**

16 Debtor.

17 Case No. BK-S-13-18735-MKN
 18 Chapter 7

19 **NOTICE OF HEARING ON**
APPLICATION TO EMPLOY PRAEMIA
LAW, PLLC AS SPECIAL LITIGATION
COUNSEL FOR LENARD
SCHWARTZER, CHAPTER 7 TRUSTEE,
PURSUANT TO 11 U.S.C. §§ 327(e) AND
328(a) AND FEDERAL RULE OF
BANKRUPTCY PROCEDURE 2014

20 Date of Hearing: June 9, 2021
 21 Time of Hearing: 11:00 a.m.
 22 Place: Courtroom No. 2, Third Floor
 Foley Federal Building
 300 Las Vegas Blvd., S.
 Las Vegas, NV 89101

23 Judge: Honorable Mike K. Nakagawa¹

24 **NOTICE IS HEREBY GIVEN** that the *Application to Employ Praemia Law, PLLC As*
Special Litigation Counsel for Lenard Schwartzer, Chapter 7 Trustee, Pursuant to 11 U.S.C. §§
327(e) and 328(a) and Federal Rule of Bankruptcy Procedure 2014 (the “Application”) was filed
 by Lenard Schwartzer (the “Trustee”) by and through his general bankruptcy counsel, Jacob L.

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26 ¹ Unless otherwise indicated, all chapter and section references are to the Bankruptcy Code, 11
 27 U.S.C. §§ 101-1532, and to the Federal Rules of Bankruptcy Procedure, Rules 1001-9037. The
 28 Federal Rules of Civil Procedure will be referred to as “FRCP” and the Federal Rules of
 Bankruptcy Procedure will be referred to as “FRBP.” The Local Rules of Practice for the United
 States Bankruptcy Court for the District of Nevada shall be referred to as the “Local Rules”.

1 Houmand, Esq. and Bradley G. Sims, Esq. of the Houmand Law Firm, Ltd.

2 The Application seeks to employ the law firm of Praemia Law, PLLC (the “Firm”), as
3 special litigation counsel for the Trustee in the litigation captioned *Six Star Cleaning and Carpet*
4 *Services, Inc. et al. v. Laborers International Union of North America Local No. 872 et al.* (Case
5 No. 2:11-cv-00524-LDG-CWH) that is pending in the United States District Court for the District
6 of Nevada (the “District Court Action”).

7 The proposed terms of the employment of Praemia are as follows: (a) Praemia will be
8 entitled to a contingency fee equal to fifty percent (50%) of any amount recovered from the
9 District Court Action; and (b) Praemia will be entitled to reimbursement of the costs that it
10 advances in the litigation related to the District Court Action. The proposed terms of the
11 employment of Praemia further provide that it may accept payment of expenses related to the
12 litigation from other plaintiffs in the District Court Action.

13 A copy of the Application, the *Declaration of Lenard Schwartzer In Support of*
14 *Application to Employ Praemia Law, PLLC As Special Litigation Counsel for Lenard Schwartzer,*
15 *Chapter 7 Trustee, Pursuant to 11 U.S.C. §§ 327(e) and 328(a) and Federal Rule of Bankruptcy*
16 *Procedure 2014*, and the *Declaration of Michael E. Avakian, Esq. In Support Application to*
17 *Employ Praemia Law, PLLC As Special Litigation Counsel for Lenard Schwartzer, Chapter 7*
18 *Trustee, Pursuant to 11 U.S.C. §§ 327(e) and 328(a) and Federal Rule of Bankruptcy Procedure*
19 *2014* are on file with the Clerk’s Office of the United States Bankruptcy Court, 300 Las Vegas
20 Blvd. South, Fourth Floor, Las Vegas, Nevada 89101. Copies of the Application and any
21 supporting declarations may also be obtained from counsel for the Trustee or through the
22 Bankruptcy Court’s website at www.nvb.uscourts.gov.

23 **NOTICE IS FURTHER GIVEN** that if you do not want the Court to grant the relief
24 sought in the Application, or if you want the Court to consider your views on the Application,
25 then you must file an opposition with the Court, and serve a copy on the person making the
26 Application ***no later than fourteen (14) days preceding the hearing date for the Application.***

27 The opposition must state your position, set forth all relevant facts and legal authority, and
28 be supported by affidavits or declarations that conform to Local Rule 9014(c).

If you object to the relief requested, you *must* file a **WRITTEN** response to this pleading with the court. You *must* also serve your written response on the person who sent you this notice.

If you do not file a written response with the court, or if you do not serve your written response on the person who sent you this notice, then:

- The Court may *refuse to allow you to speak* at the scheduled hearing; and
- The Court may *rule against you* without formally calling the matter at the hearing.

NOTICE IS FURTHER GIVEN that a hearing on said Application will be held before a United States Bankruptcy Judge, in the Foley Federal Building, 300 Las Vegas Blvd. South, Las Vegas, Nevada on June 9, 2021 at 11:00 a.m. Due to the Coronavirus (Covid 19) pandemic, the Court will conduct a telephonic hearing on the Fee Application. Please check the Bankruptcy Court's website prior to the hearing for the call-in number, at: <https://www.nvb.uscourts.gov/calendars/court-calendars/>

NOTICE IS FURTHER GIVEN that this hearing may be continued from time to time without further notice except for the announcement of any adjourned dates and times at the above-noted hearing or any adjournment thereof.

Dated this 6th day of May, 2021.

HOUMAND LAW FIRM, LTD.

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